

**To:** Huitric, Michele[Huitric.Michele@epa.gov]  
**From:** Huitric, Michele  
**Sent:** Thur 6/9/2016 1:00:20 AM  
**Subject:** Test

QUESTION: In an email below, you said the UCSC presentation had some inaccuracies. What specifically is inaccurate?

ANSWER: The UCSC presentation left out certain relevant information; some of the key omissions include the following:

- EPA has incorporated the latest version of EPA risk models into its review process to ensure the HPNS cleanup continues to be protective of human health and the environment. EPA has reviewed the Navy's past HPNS cleanup reports, applying the current EPA risk model, and confirmed that the Navy's earlier work had achieved the cleanup level needed to protect human health and the environment.
- The Navy and EPA assessments of cleanup needs are based on scenario assumptions of exposure that are higher than realistic. In part, this is because the assumptions of exposure do not take into account the protective cover that the Navy is installing.
- EPA considers the protective range to refer to a probability that a person exposed to radioactive and chemical contaminants will have between one in ten thousand ( $10^{-4}$ ) and one in a million ( $10^{-6}$ ) greater chance of developing cancer. The presentation did not reflect this complete range.

QUESTION: Does the EPA agree that Superfund law requires Hunters Point must be cleaned up consistent with EPA Superfund guidance?

ANSWER: EPA creates guidance to implement laws and regulations so that programs can be implemented more consistently. If site specific conditions suggest variation from EPA guidance would be more suitable, EPA has that flexibility.

QUESTION: The UCSC team said the Navy's cleanup has been using standards that violate this requirement and that the Navy is using standards that the EPA said should not be used. Does the EPA refute this?

ANSWER: EPA incorporates the latest EPA risk models into its review process to ensure the HPNS cleanup continues to be protective of human health and the environment. EPA has reviewed the Navy's past HPNS cleanup reports, applying the current EPA risk model, and confirmed that the Navy's earlier work had achieved the cleanup level needed to protect human health and the environment.

QUESTION: The USCS team said the EPA either didn't catch or allowed the Navy to use cleanup standards that are much more lax than what the EPA has said is protective of public health. Does the EPA refute this?

ANSWER: EPA reviews the Navy's cleanup report for each survey unit (small area of land or part of a building) of HPNS using the current version of the EPA risk model to make sure that radiation levels are within the protective  $10^{-4}$  to  $10^{-6}$  cancer risk range. This ensures that any land that is transferred to the City of San Francisco for new use meets appropriate levels for protectiveness with regard to radiation. To provide additional protection, the Navy is installing a protective cover over the whole site. The Navy is also developing a plan for each parcel that is transferred to the City, which EPA will review, that ensures the Navy or City will maintain and inspect the cover indefinitely.